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Attorneys for Defendant
LIBERTY INSURANCE CORPORATION, erroneously sued as
LIBERTY MUTUAL INSURANCE

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MILAD ISKANDER,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE,

Defendant.

Case No. 2:24-cv-02750-JAM-SCR

**STIPULATION AND ORDER TO
CONTINUE DESIGNATION OF
EXPERT WITNESSES DEADLINE
ONLY**

Date of Removal: October 4, 2024

IT IS HEREBY STIPULATED by and between Plaintiff MILAD ISKANDER (“Plaintiff”), on the one hand, and Defendant LIBERTY INSURANCE CORPORATION, erroneously sued as LIBERTY MUTUAL INSURANCE (“Defendant”), on the other hand, through their respective attorneys, as follows:

WHEREAS, Plaintiff filed the complaint on August 22, 2024, in Solano County Superior Court (ECF 1, Ex. B.);

WHEREAS, Defendant removed the action to this Court on October 2, 2024 (ECF 1);

WHEREAS, pursuant to February 21, 2025 Scheduling Order (ECF 8), the Court set July 18, 2025 as the Designation of Expert Witnesses deadline.

WHEREAS, the parties have diligently engaged in discovery, but were forced to postpone the date of a site inspection originally scheduled for June 19, 2025 by roughly one month due to a family emergency of Plaintiff’s counsel, and Defendant’s expert witness’ contraction of an illness.

The parties are cooperating with each other to schedule and complete the site inspection and subsequent expert reports, though they require additional time to do so.

WHEREAS, counsel for Plaintiff and Defendant have agreed to continue the July 18, 2025 Designation of Expert Witnesses deadline by thirty-one (31) days to August 18, 2025 in order to complete the site inspection and subsequent expert reports; and

WHEREAS, no previous extension has been requested or obtained.

WHEREAS, the thirty-one (31) day continuance of the Designation of Expert Witnesses deadline to August 18, 2025 is reasonable and does not affect any other deadlines scheduled by the Court or the trial date in this matter.

NOW, THEREFORE, AND FOR GOOD CAUSE SHOWN, THE PARTIES HEREBY STIPULATE THAT the July 18, 2025 Designation of Expert Witnesses deadline shall be continued to August 18, 2025.

Court Set Case Schedule	Current Deadline	[Proposed] New Deadline
Designation of Expert Witnesses Deadline	July 18, 2025	August 18, 2025

IT IS SO STIPULATED.

Dated: July 17, 2025

MAYNARD NEXSEN LLP

By /s/ Nicholas J. Boos
NICHOLAS J. BOOS

Attorneys for Defendant
LIBERTY INSURANCE
CORPORATION, erroneously sued as
LIBERTY MUTUAL INSURANCE

Dated: July 17, 2025

BALESTRA WEBB LAW

By /s/ Bryan R. Smith
BRYAN R. SMITH

Attorneys for Plaintiff
MILAD ISKANDER

ORDER

Based on the stipulation of the parties and good cause appearing, the case schedule is
MODIFIED as follows:

Court Set Case Schedule	Current Deadline	New Deadline
Designation of Expert Witnesses Deadline	July 18, 2025	August 18, 2025

All other deadlines and instructions contained in the Pretrial Scheduling Order (ECF No. 8), entered on February 21, 2025, shall remain in effect.

IT IS SO ORDERED.

Dated: July 17, 2025

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE